NEVADA DIVISION OF ENVIRONMENTAL PROTECTION

F A C T S H E E T

(pursuant to NAC 445A.236)

Permittee: Flamingo Hilton Hotel and Casino
P.O. Box 1290
Reno, Nevada 89503

Permit: NV0021121 – Renewal

General: The Permittee has applied for a National Pollutant Discharge Elimination System (NPDES) permit renewal to discharge groundwater from a basement sump at 225 North Sierra Street to the Truckee River via the City of Reno Sierra Street stormdrain. An NPDES permit for this discharge was first issued November 8, 1977 to the Del Webb Corporation for the Sahara Reno Hotel construction dewatering. In 1983, the permit was re-issued to the Reno – Hilton Hotel Casino.

The Flamingo Hilton building includes a three – level, underground parking garage. Groundwater is collected at the lowest level of the garage via an engineered system of foundation drainage piping. The drainage system discharges through outlets along the east, west and north walls of the lowest level of the garage. The discharge from the east wall outfalls is captured in a collection trough that conveys the water to the 750 – gallon sand filter/catch basin located at the south end of the garage. The discharge from the west and north wall outfalls is routed through troughs to floor drains and piped to the sand filter/catch basin. Concrete berms have been constructed to prevent cars from parking over the troughs. Some seepage occurs through floor and second floor expansion joints. Most of this water evaporates prior to reaching the troughs.

The sand filter/catch basin receives all water from the groundwater collection system. This unit partially separates oils from the water. Water passing through the catch basin flows to the lift station sump. The lift station is located in a separate room in the garage. Two submersible pumps are actuated by a float system. Alarm signals are relayed to the security office for high level and pump failure. Totalizing flow meters are located on the discharge mains for each of the two pumps.

Discharge from this facility has been figured into the Truckee River Total Maximum Daily Load (TMDL) document, approved by EPA April 1994, as a background source.

Low levels of Tetrachloroethylene (PCE), Trichloroethylene (TCE), Freon 112, Methyl tert – butyl ether (MTBE) and cis – 1,2 Dichloroethane (1, 2 – DCA) were detected in the groundwater underlying downtown Reno during a regional groundwater study performed by Simon Hydro – Search, Inc. in November 1991 and EMA in August 1992. Washoe County has created the Central Truckee Meadows Remediation District (CTMRD) to address the PCE contamination.

Receiving Water Characteristics: The groundwater is discharged to the Truckee River via the City of Reno stormdrain system. The Truckee River at East McCarran, NAC 445A.186, standards apply for this stream segment. Waters of the Truckee River are of good quality in the segment. Beneficial uses of the Truckee River from Pyramid Lake to the state line are: irrigation; watering of livestock; recreation involving contact with the water; recreation not involving contact with the water; industrial supply; municipal or domestic supply, or both;
propagation of wildlife; and propagation of aquatic life. From Idlewild to East McCarran, the aquatic life of major concern are all life stages of mountain whitefish, rainbow trout and brown trout, NAC 445A.183.

Location of Discharge: Latitude: 39° 30' N; Longitude: 119° 47' W
Township 19 North, Range 19 East, Section 11, NW of SE ¼ MDB&M
Near the Arlington Street Bridge, approximately 2.5 miles upstream of the Glendale Water Treatment Plant.

Flow: The reported volume of discharge has been 3,000 gallons/day (gpd) every quarter since 1981 except the first and second quarters of 1997. Prior to 1995, all discharge flows were estimated. In the first and second quarters of 1997, quarterly average discharges of 43,000 gpd and 27,000 gpd, respectively, w ere reported.

Quantities: Using the maximum permitted 30–day average discharge of 35,000 gpd and the average concentration of constituents of concern from the previous three years 'discharge monitoring reports, i.e., total nitrogen (TN) 3.4 mg/L and total phosphorus (TP) 0.05 mg/L (1/3 of the 0.14 mg/L phosphate concentration), the following quantities were calculated: TN 0.99 lb/day and TP 0.02 lb/day. These loadings both comply with the Division's Truckee River TMDL Exemption Policy and have been incorporated into the permit as effluent discharge limitations. Monitoring of the total dissolved solids (TDS) concentration in the discharge was not required by the previous permit. Since a significant portion of the Truckee River TDS TMDL has not yet been assigned to load allocations or wasteload allocations, the draft permit does not contain a daily TDS load limitation.

Procedures for Public Comment: The Notice of the Division's intent to reissue a permit authorizing the facility to discharge to surface waters of the State of Nevada subject to the conditions contained within the permit, is being sent to the **Reno Gazette–Journal** for publication. The notice is being mailed to interested persons on our mailing list. Anyone wishing to comment on the proposed permit can do so in writing until 5:00 P.M. August 20, 2001, a period of 30 days following the date of publication of the public notice. The comment period can be extended at the discretion of the Administrator.

A public hearing on the proposed determination can be requested by the applicant, any affected State, any affected interstate agency, the Regional Administrator of EPA Region IX or any interested agency, person or group of persons. The request must be filed within the comment period, must indicate the interest of the person filing the request, and must state the reasons why a hearing is warranted. Any public hearing determined by the Administrator to be held must be conducted in the geographical area of the proposed discharge or any other area the Administrator determined to be appropriate. All public hearings must be conducted in accordance with NAC 445A.238.

The final determination of the Administrator may be appealed to the State Environmental Commission pursuant to NRS 445A.605.

Proposed Effluent Limitations:

TABLE I.A.1.b: Effluent Limitations

PARAMETERS	EFFLUENT DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS		
	30-Day Average	Daily Maximum	Sample Locations	Measurement Frequency	Sample Type
Totalizer Readings (2)	Monitor & Report (gallons)		Ii	Monthly(1)	Meter Reading
Flow	0.035 MGD	0.044 MGD	---	Monthly (1)	Calculate(2)
Total Nitrogen –N	Monitor & Report (mg/L)		I	Quarterly	Discrete
	< 1.0 lb/day		---	Quarterly	Calculate(3)
Total Phosphorus	Monitor & Report (mg/L)		I	Quarterly	Discrete
	0.02 lb/day		---	Quarterly	Calculate(3)
TPH EPA SW-846 Method 8015 (modified to detect extractable fuel hydrocarbons)	1.0 mg/L		I	Monthly(1)	Discrete
EPA Method 624 (report all parameters) Tetrachloroethylene (PCE) Trichchloroethylene (TCE) Chloroform	Monitor & Report (µg/L) 5 µg/L 5 µg/L 80 µg/L		I	Quarterly	Discrete
Total Dissolved Solids	500 mg/L		I	Annually(4)	Discrete
	Monitor & Report (lb/day)		---	Annually(4)	Calculate(3)

Notes:

(1) Reported quarterly.
(2) Subtract previous month's totalizer reading from the current month's totalizer reading.
(3) Pounds/day = Concentration (mg/L) x Flow (MGD) x 8.34.
(4) To be sampled in the fourth quarter and submitted to the Division with the Annual Report.

mg/L:	Milligram per liter
µg/L:	Micrograms per liter
lb/day:	Pounds per day
MGD:	Million gallons per day
–N:	As nitrogen
<:	Less than
i:	The sump of the garage lift station
ii:	Two (2) totalizing flow meters on the discharge mains for the garage lift station pumps

Schedule of Compliance and Special Conditions: The Permittee shall implement and comply with the provisions of the schedule of compliance after approval by the Administrator, including in said implementation and compliance, any additions or modifications which the Administrator may make in approving the schedule of compliance.

a. The Permittee shall achieve compliance with the effluent limitations upon issuance of the permit.

b. The Permittee shall submit reports illustrating compliance or noncompliance with specified compliance dates within 14 days of any respective, scheduled compliance date.

c. The Permittee shall submit a report evaluating the condition and accuracy of the two totalizing flow meters located on the discharge mains for the two pumps in the garage lift station within sixty (60) days of the effective date of the permit.

d. The Permittee shall submit a revised Operations and Maintenance Manual for review and approval within ninety (90) days of the effective date of the permit.

Rational for Permit Requirements: Monitoring is required to assess the quality of the discharge water and to ensure that the extracted groundwater will not impact the beneficial uses of the Truckee River.

The total phosphorus and total nitrogen load limitations are explained in the Quantities Section of this fact sheet.

The TDS limitation of 500 mg/L is based on the water quality standards for beneficial uses of the Truckee River at East McCarran, NAC 445A.186. From historic data for this project, the groundwater TDS concentration ranges from 250 mg/L to 450 mg/L.

Analysis for total petroleum hydrocarbons (TPH), EPA SW-846 Method 8015, modified to detect "extractable fuel hydrocarbons," was added to the draft permit renewal, in response to a recommendation from a site inspection and to be consistent with the monitoring required of other dewatering discharges to the Truckee River. TPH monitoring is required due to historic leakage from underground storage tanks in downtown Reno and to verify that TPH from the underground garage is not entering the lift station.

Using EPA Method 624, less than 2.0 µg/L chloroform was frequently identified in the discharge until the Permittee's laboratory raised the detection limit to 5.0 µg/L. Although never detected in the Permittee's discharge, limitations on the PCE and TCE concentrations in the discharge were added to the draft permit because these compounds have been detected in the dewatering discharge of other properties in the area and the facility is located within the CTMRD.

Due to the low discharge rate, historical quality of the discharge, the groundwater quality data included in the permit renewal application, and the discharge of noncontact dewatering water, metals, pH and temperature characterization of

the discharge is not required by the permit conditions.

Proposed Determination: The Division has made the tentative determination to re-issue the proposed permit for a five-year period.

Prepared by: Bruce Holmgren
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